

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

No. 12-md-2323 (AB)

MDL No. 2323

THIS DOCUMENT RELATES TO:

Plaintiffs' Master Administrative Long-
Form Complaint and:

Floyd Little, et al. v. National Football
League, et al. (Plaintiff James Arnold
ONLY)

Court File No. 2:12-cv-2219-AB

**MOTION FOR LEAVE TO
WITHDRAW AS COUNSEL
FOR PLAINTIFF JAMES ARNOLD**

Charles S. Zimmerman, J. Gordon Rudd, Jr., Brian C. Gudmundson, and Michael J. Laird of Zimmerman Reed LLP ("Plaintiff's Counsel"), move this Court pursuant to Pennsylvania Rule of Professional Conduct 1.16(b)(1) and United States District Court for the Eastern District of Pennsylvania Local Rule of Civil Procedure 5.1(c) to withdraw as counsel in relation to the claims of James Arnold only in this action, and state as follows:

1. Plaintiff's counsel filed the action *Floyd Little, et al. v. National Football League, et al.*, No. 2:12-cv-2219-AB, in the Eastern District of Pennsylvania on April 24, 2012, for the benefit of several retired National Football League players, including James Arnold.

2. Plaintiff's counsel filed a short form complaint for James Arnold on July 12, 2012.

3. Since then, irreconcilable differences have arisen between Plaintiff James Arnold and the undersigned.

4. Plaintiff's counsel properly notified James Arnold of counsel's intention to withdraw from representing him in this matter.

5. Under the circumstances, it is apparent that the undersigned must move the Court for leave to withdraw as counsel.

WHEREFORE, Plaintiff's counsel respectfully requests this Court for leave to withdraw as counsel for James Arnold only in Court File No. 2:12-cv-2219-AB.

Dated: February 25, 2019

Respectfully submitted,

ZIMMERMAN REED LLP

s/ Brian C. Gudmundson

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